

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

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In re

IULIAN AND CRISTINA BIKA

Debtor
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Case No. 1-22-41122-JMM
Chapter 11

**AFFIRMATION IN SUPPORT OF
MOTION TO REINSTATE CASE**

TO THE HONORABLE MARK J CONWAY
UNITED STATES BANKRUPTCY JUDGE:

Jeb L. Singer, Esq., pursuant to 28 U.S.C. 1746, declares under penalty of perjury that the following is true and correct.

1. I am the Managing Partner of J. Singer Law Group, PLLC, attorneys for Debtors in the above-referenced Chapter 7 bankruptcy case. I file this Affirmation in Support of the Debtor's Motion to Set Aside the Dismissal of the Chapter 7 Bankruptcy Case and Reinstate the Case.

2. I am an attorney at law duly licensed to practice before all courts in the State of New York and am admitted to practice in the Middle District of Pennsylvania. I have knowledge of the matters contained herein and they are true and correct of my own personal knowledge, except for those matters stated upon information and belief as to those matters, I believe them to be true and correct. If called and sworn as a witness, I could and would testify competently thereto.

3. On August 22, 2022, the Debtor filed a Petition for Relief under Chapter 7 of Title 11 of the United States Code (Bankruptcy Code).

4. The primary purpose of this bankruptcy case is to discharge certain old tax liabilities which are dischargeable pursuant to Section 508 (a)(8) of the Code and to discharge other liabilities which the Debtors are unable to pay.

5. At all times relevant, the Debtors have acted in good faith.

6. On September 23, 2022, the Debtors with counsel attended their Meeting of Creditors

7. On September 30, 2022, undersigned counsel was admitted to practice in this Court Pro Hac Vice.

8. On October 7, 2022, the Court dismissed this case for the Debtors' failure to file forms required pursuant to Section 521i of the Code. Specifically, the Debtors, through counsel, had failed to file pay stubs.

9. The Debtors intend to file their pay advices upon the reinstatement of this case.

10. The Debtors' failure to file pay stubs was inadvertent and due to this office's mistake and not due to any mistake on behalf of the Debtors. The undersigned apologizes to the Court for not filing the pay advices.

11. The Debtors would be prejudiced if they are not permitted to reinstate the case to conclude the same because they will be forced to go through the entire bankruptcy process after substantially completing the process and fully cooperating.

12. No creditors would be prejudiced if the Court were to reinstate the case because this has been a no asset case since its filing.

13. The undersigned respectfully submits that Creditors will suffer no prejudice with respect to its ability to participate in a dividend.

WHEREFORE, it is respectfully requested that the dismissal of this case be set aside and the that this case be reinstated together with such other, further and different relief as this Court deems just, proper and equitable.

/s/ Jeb Singer
Jeb Singer, Esq.